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FILED  
U.S. DISTRICT COURT  
DISTRICT OF WYOMING  
2023 NOV 15 PM 4:36  
MARGARET DOTKINS, CLERK  
CHEYENNE

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 23-CR-161-J

ADAM SHANE AVILES, JR.,

Defendant.

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MOTION FOR DETENTION HEARING

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The United States moves for pretrial detention of the Defendant, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves the following:

**Crime of Violence (18 U.S.C. § 3156)**

**Serious risk Defendant will flee**

**A felony involving possession of a firearm (see 18 U.S.C. § 3142(f)(1)(E))**

2. Reason for Detention. The court should detain the Defendant because there are no conditions of release which will reasonably assure:

**Safety of any other person and the community**

3. Rebuttable Presumption. The United States will not invoke the rebuttable presumption against the Defendant under § 3142(e).


4. Time for Detention Hearing. The United States requests the Court conduct the detention hearing:

**After a continuance of three days**

DATED this 14<sup>th</sup> day of November, 2023.

NICHOLAS VASSALLO  
United States Attorney

By:

  
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PAIGE HAMMER  
Assistant United States Attorney